

EXHIBIT A

3/30/2020

<https://casesearch.epcounty.com/PublicAccess/CaseDetail.aspx?CaseID=8399383>[Skip to Main Content](#) [Logout My Account](#) [Search Menu](#) [New Civil Search](#) [Refine Search](#) [Back](#)[Location : All Courts](#) [Help](#)**REGISTER OF ACTIONS****CASE No. 2020DCV0628**

Free and Sovereign State of Chihuahua VS Cesar Horacio Duarte Jaquez, §
 Bertha Olga Gomez Fong, Olga Sofia Duarte Gomez, Olga Duarte Jaquez, §
 Cesar Adrian Duarte, CAD Construction, Inc., Gabriela Armendariz §
 Chaparro, Manuel Alberto Garza, 44 Fountain Rd., LLC, and 110 S. §
 Festival, LLC §

Case Type: **Other Civil**
 Date Filed: **02/19/2020**
 Location: **448th District Court**

PARTY INFORMATION**Lead Attorneys**

Defendant 110 S. Festival, LLC

Defendant 44 Fountain Rd., LLC

Defendant CAD Construction, Inc.

Defendant Chaparro, Gabriela Armendariz

Defendant Duarte Gomez, Cesar Adrian

Defendant Duarte Gomez, Olga Sofia

Defendant Duarte Jaquez, Cesar Horacio

Defendant Duarte Jaquez, Olga

Defendant Garza, Manuel Alberto

Defendant Gomez Fong, Bertha Olga

Plaintiff Free and Sovereign State of Chihuahua

ANTHONY G BUZBEE
Retained
 713-223-5393(W)

EVENTS & ORDERS OF THE COURT**OTHER EVENTS AND HEARINGS**

02/19/2020 **Original Petition (OCA)** Doc ID# 1

02/19/2020 **E-File Event Original Filing**

02/20/2020 **Request** Doc ID# 2

02/25/2020 **Citation**

Duarte Jaquez, Cesar Horacio	Unserved	
Gomez Fong, Bertha Olga	Served	03/20/2020
	Response Due	04/13/2020
	Returned	03/24/2020
Duarte Gomez, Olga Sofia	Served	03/12/2020
	Response Due	04/06/2020
	Returned	03/17/2020
Duarte Jaquez, Olga	Served	03/12/2020
	Response Due	04/06/2020
	Returned	03/19/2020
Duarte Gomez, Cesar Adrian	Unserved	
CAD Construction, Inc.	Unserved	
Chaparro, Gabriela Armendariz	Served	03/05/2020
	Response Due	03/30/2020
	Returned	03/19/2020
Garza, Manuel Alberto	Unserved	
44 Fountain Rd., LLC	Unserved	
110 S. Festival, LLC	Unserved	

El Paso County - 448th District Court

Filed 2/19/2020 10:05 AM

Norma Favela Barcelean
District Clerk
El Paso County
2020DCV0628

CAUSE NO. _____

FREE AND SOVEREIGN STATE OF	§	IN THE DISTRICT COURT OF
CHIHUAHUA	§	
<i>Plaintiff,</i>	§	
	§	_____ JUDICIAL DISTRICT
vs.	§	
	§	
CESAR HORACIO DUARTE JAQUEZ,	§	
BERTHA OLGA GOMEZ FONG,	§	
OLGA SOFIA DUARTE GOMEZ,	§	EL PASO COUNTY, TEXAS
OLGA DUARTE JAQUEZ,	§	
CESAR ADRIAN DUARTE,	§	
CAD CONSTRUCTION, INC.,	§	
GABRIELA ARMENDARIZ CHAPARRO,	§	
MANUEL ALBERTO GARZA,	§	
44 FOUNTAIN RD., LLC, AND	§	
110 S. FESTIVAL, LLC.	§	
<i>Defendants.</i>	§	JURY TRIAL DEMANDED

**PLAINTIFF FREE AND SOVEREIGN STATE OF CHIHUAHUA'S
ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE**

TO THIS HONORABLE COURT:

Plaintiff, Free and Sovereign State of Chihuahua ("Chihuahua"), files this Original Petition against Defendants Cesar Horacio Duarte Jaquez, Bertha Olga Gomez Fong, Olga Sofia Duarte Gomez, Olga Duarte Jaquez, Cesar Adrian Duarte, CAD Construction, Inc., Gabriela Armendariz Chaparro, Manuel Alberto Garza, 44 Fountain Rd., LLC, and 110 S. Festival, LLC., and respectfully shows this Honorable Court the following:

Summary of this Case

Cesar Horacio Duarte Jaquez was the governor of the Mexican state of Chihuahua from 2010 until 2016. His time as governor was marked by multiple controversies and reports of rampant corruption. The extensive corruption in Duarte's administration reached across the borders of Mexico into the United State of America. Duarte orchestrated a scheme in which hundreds of millions of dollars earmarked for social programs were diverted to an elaborate

network of phantom companies – among other misdeeds. One nefarious act of corruption and greed by Duarte was when his administration purchased cancer medications at a 300% price inflation rate with ties to his own businesses and administered them to the State’s child cancer patients. The medication was purchased using the state’s monies to which Duarte and his administration stole the excess and used it to purchase properties in the United States. Indeed, he is alleged to have absconded with hundreds of millions of his state’s monies. This stolen money was used to make investments and purchase luxury homes and cars all over the United States including Texas. As the allegations against him grew, Mr. Duarte eventually fled Chihuahua, and then Mexico. Mr. Duarte was later indicted in Mexico with more than 21 warrants for his arrest based on corruption and fraud. Cesar Duarte is believed to be hiding in El Paso, Texas and Albuquerque, New Mexico.

The money stolen by Duarte rightfully belong to the people of the State of Chihuahua. The State thus files this and other actions in an effort to recoup those funds stolen by Duarte and those acting in concert with him. Chihuahua also seeks to recover assets purchased with such stolen funds.

Each of the Defendants named above conspired with Cesar Horacio Duarte Jacquez to steal government funds from the State of Chihuahua. Further, each of the named Defendants purchased properties in Texas with the stolen money. The properties listed *in rem* are just a few of the many purchased with stolen funds all across the United States and the world.

I. Discovery Control Plan

1. Plaintiff intends to conduct discovery under Level 2.

II. Parties

2. Plaintiff State of Chihuahua is a foreign state entity of Mexico.

3. Defendant Cesar Horacio Duarte Jaquez is a foreign individual who may be served with process at his last known address at 343 Crimson Cloud, El Paso, Texas, or wherever he may be found.

4. Defendant Bertha Olga Gomez Fong, is Cesar Horacio Duarte's wife. She may be served via personal service at her last known address at 343 Crimson Cloud, El Paso, Texas, or wherever she may be found.

5. Defendant Olga Sofia Duarte Gomez is an individual residing in Texas. She may be served with process at her last known address at 343 Crimson Cloud, El Paso, Texas 79912, or wherever she may be found.

6. Defendant Cesar Adrian Duarte Gomez is an individual residing in Texas. He may be served with process at his last known address at 378 Morning Star, El Paso, Texas 79912, or wherever he may be found.

7. Defendant Olga Duarte Jaquez is an individual residing in Texas. She may be served with process at her last known address at 100 Stern Drive, El Paso, Texas, 79932, or wherever she may be found.

8. Defendant CAD Construction, Inc., is a domestic for-profit corporation. It can be served via personal service via its registered agent, Cesar Adrian Duarte, at 343 Crimson Cloud, El Paso, Texas 79912.

9. Defendant Gabriela Armendariz Chaparro is an individual residing in Texas. She can be served with process at her last known address at 6928 Diamond Ridge Dr, El Paso, Texas, 79912, or wherever she may be found.

10. Defendant Manuel Alberto Garza is an individual residing in Texas. He can be served with process at this last known address at 236 Hidden Crest Circle, El Paso, Texas, 79912, or wherever he may be found.

11. Defendant 44 Fountain Rd., LLC, is a domestic limited liability company. It can be served via personal service via its registered agent, Daniel S. Gonzalez, at 909 E. Rio Grande Ave., El Paso, Texas, 79902.

12. Defendant 110 S. Festival, LLC, is a domestic limited liability company. It can be served via personal service via its registered agent, Daniel S. Gonzalez, at 909 E. Rio Grande Ave., El Paso, Texas, 79902.

In Rem Parties

13. Plaintiff makes claims against the following properties in rem.

14. 343 Crimson Cloud is a property located in El Paso, Texas; its record owner is Defendant Bertha Olga Gomez Fong. The funds used to purchase this property were stolen from Chihuahua.

15. 263 Everest Dr., is a property located in El Paso, Texas; its record owner is Defendant CAD Construction, Inc. The funds used to purchase this property were stolen from Chihuahua.

16. 100 Stern Dr is a property located in El Paso, Texas; its record owner is Defendant Olga Duarte Jaquez. The funds used to purchase this property were stolen from Chihuahua.

17. 6928 Diamond Ridge Dr. is a property located in El Paso, Texas; its record owner is Defendant Gabriela Armendariz Chaparro. The funds used to purchase this property were stolen from Chihuahua.

18. 236 Hidden Crest Cir. is a property located in El Paso, Texas; its record owner is Defendant Manuel Alberto Garza. The funds used to purchase this property were stolen from Chihuahua.

19. 44 Fountain Rd is a property located in El Paso, Texas; its record owner is Defendant 44 Fountain Rd., LLC. The funds used to purchase this property were stolen from Chihuahua.

20. 110 Festival Dr is a property located in El Paso, Texas; its record owner is Defendant 110 S. Festival, LLC. The funds used to purchase this property were stolen from Chihuahua.

III.

Venue and Jurisdiction

Plaintiff seeks damages in excess of \$75,000.00, exclusive of interest and costs; however, federal courts lack subject matter over this action, as there is no federal question and there is incomplete diversity of citizenship due to the presence of a defendant who is a resident and citizen of Texas. Removal would thus be improper. No party is asserting any claims arising under the Constitution, treaties, or laws of the United States. Venue is proper in this County as at least one defendant maintains a principal office here and most of the properties involved are here.

IV.

Causes of Action

A. Conversion – All Defendants

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully below.

Plaintiff owned, possessed, and had the right to the funds that were stolen by Cesar Duarte and his network to invest into the above referenced assets. These funds were the property of State of Chihuahua. Defendants are currently wrongfully exercising control over this property.

Plaintiff has suffered injury because of these actions.

B. Theft Liability Act – All Defendants

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully below.

Defendant Duarte unlawfully appropriated property with the intent to deprive the owner of this property. In this case, the property belonged to the State of Chihuahua. Currently, this property is owned or controlled by Defendants.

C. Constructive Trust – All Defendants

Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully below. Plaintiff seeks a constructive trust over Mr. Duarte and his associates' interest in the subject properties. Mr. Duarte and his associates conspired together and looted government coffers and engaged in other graft that stole money from the State of Chihuahua. Mr. Duarte and his associates took those funds and invested into the above referenced assets, among other things. Mr. Duarte had a fiduciary relationship with the State of Chihuahua. More importantly, Mr. Duarte and his associates committed both actual and constructive fraud in obtaining these funds. These funds were then used to invest in properties in Texas.

D. Civil Conspiracy – All Defendants

Plaintiffs would show that Duarte, together with the named Defendants, conspired with Duarte and his associates to steal and embezzle, and to commit fraud on Plaintiff. The purpose of the conspiracy was move as much money as possible from the State of Chihuahua to the United States for the benefit of Mr. Duarte and his family. Duarte and the named Defendants had a meeting of the minds on this objective and, as shown in detail above, together, made one or more unlawful and overt acts towards this objective. As a result, Plaintiff suffered damages. Plaintiff also seeks punitive damages.

E. Joint and Several Liability – All Defendants

Duarte and the other Defendants are joint and severally liable for all acts of Duarte and his associates, the conspirators as referenced above. Duarte and the other Defendants planned and

assisted in this conspiracy, and, as such, they are jointly and severally liable for all acts done by any member of the conspiracy in furtherance of such.

F. Texas Penal Code 31.03(e)(7) – All Defendants

The previous paragraphs are incorporated herein. Defendants unlawfully appropriated property with intent to deprive the owner, the State of Chihuahua, of its property. Defendants did not have the effective consent of the State of Chihuahua. Additionally, the property at issue is stolen and the various actors appropriated the property knowing it was stolen by another.

**V.
Damages**

As a direct and proximate result of the foregoing events, Chihuahua suffered damages in the form of stolen funds, all for which Plaintiff seeks recovery herein.

**VI.
Exemplary Damages**

Plaintiff seeks to recover exemplary damages against all Defendants based on their criminal conduct and resulting injuries and damages made the basis of this suit. Any caps or limits on punitive damages should not be applied because Defendants' conduct and violations of the Penal Code, including 31.03, disqualifies them from the benefit of any caps.

**VII.
Demand for Jury**

Plaintiff demands a jury trial and has tendered the appropriate fee.

**VIII.
Request for Disclosure**

Pursuant to Tex. R. Civ. P. 194, Plaintiff requests that each Defendant disclose within fifty (50) days of service of this Request for Disclosure, the information and/or material described in Rule 194.2.

IX.
Prayer

For these reasons, Plaintiff asks that Defendants be cited to appear and answer, and that they have judgment against Defendants for the following:

- a. Actual damages within the jurisdictional limits of this Court, but no less than \$25,000,000;
- b. Exemplary damages;
- c. Court costs;
- d. Pre and post judgment interest; and
- e. All other relief to which the Plaintiff is justly entitled.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: /s/ Anthony G. Buzbee

Anthony G. Buzbee
State Bar No. 24001820
tbuzbee@txattorneys.com
Christopher J. Leavitt
State Bar No. 24053318
cleavitt@txattorneys.com
Caroline E. Adams
State Bar. No. 24011198
cadams@txattorneys.com
JP Morgan Chase Tower
600 Travis, Suite 6850
Houston, Texas 77002
Telephone: (713) 223-5393
Facsimile: (713) 223-5909

ATTORNEYS FOR PLAINTIFF

El Paso County - 448th District Court

Filed 2/20/2020 12:18 PM

Norma Favela Barceleau

District Clerk

El Paso County

2020DCV0628

CIVIL PROCESS REQUEST

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: 2020DCV0628 CURRENT COURT: 448th JDC El Paso County, Texas

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: February 19, 2020
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Cesar Horacio Duarte Jaquez

ADDRESS: 343 Crimson Cloud, El Paso, Texas

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

☐ ATTORNEY PICK-UP

☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Court Records Research

Phone: _____

☐ MAIL

☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or

☐ NEWSPAPER OF YOUR CHOICE: _____

☐ OTHER, explain _____

2. NAME: Bertha Olga Gomez Fong

ADDRESS: 343 Crimson Cloud, El Paso, Texas

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

☐ ATTORNEY PICK-UP

☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Court Records Research

Phone: _____

☐ MAIL

☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or

☐ NEWSPAPER OF YOUR CHOICE: _____

☐ OTHER, explain _____

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: Christopher J. Leavitt TEXAS BAR NO./ID NO. 24053318

MAILING ADDRESS: 600 Travis Street, Suite 7300, Houston, TX 77002

PHONE NUMBER: 713 223-5393 FAX NUMBER: 713 223-5909
area code phone number area code fax number

EMAIL ADDRESS: cleavitt@txattorneys.com

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CASE NUMBER: 2020DCV0628 CURRENT COURT: 448th JDC El Paso County, Texas

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: February 19, 2020
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Olga Sofia Duarte Gomez

ADDRESS: 343 Crimson Cloud, El Paso, Texas 79912

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

☐ ATTORNEY PICK-UP ☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Court Records Research Phone: _____

☐ MAIL ☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or

☐ NEWSPAPER OF YOUR CHOICE: _____

☐ OTHER, explain _____

2. NAME: Cesar Adrian Duarte Gomez

ADDRESS: 378 Morning Star, El Paso, Texas 79912

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citatio

SERVICE BY (check one):

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EMAIL ADDRESS: cleavitt@txattorneys.com

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CASE NUMBER: 2020DCV0628 CURRENT COURT: 448th JDC El Paso County, Texas

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: February 19, 2020
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Olga Duarte Jaquez

ADDRESS: 100 Stern Drive, El Paso, Texas, 79932

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

☐ ATTORNEY PICK-UP ☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Court Records Research Phone: _____

☐ MAIL ☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or

☐ NEWSPAPER OF YOUR CHOICE: _____

☐ OTHER, explain _____

2. NAME: CAD Construction, Inc.

ADDRESS: 343 Crimson Cloud, El Paso, Texas 79912.

AGENT, (if applicable): Cesar Adrian Duarte

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

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PHONE NUMBER: 713 223-5393 FAX NUMBER: 713 223-5909
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CASE NUMBER: 2020DCV0628 CURRENT COURT: 448th JDC El Paso County, Texas

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): Plaintiff's Original Petition

FILE DATE OF MOTION: February 19, 2020
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: Gabriela Armendariz Chaparro

ADDRESS: 6928 Diamond Ridge Dr, El Paso, Texas 77912

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

☐ ATTORNEY PICK-UP ☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Court Records Research Phone: _____

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☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or
☐ NEWSPAPER OF YOUR CHOICE: _____

☐ OTHER, explain _____

2. NAME: Manuel Alberto Garza

ADDRESS: 236 Hidden Crest Circle, El Paso, Texas, 79912

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

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FILE DATE OF MOTION: February 19, 2020
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: 44 Fountain Rd., LLC

ADDRESS: 909 E. Rio Grande Ave., El Paso, Texas, 79902

AGENT, (if applicable): Daniel S. Gonzalez

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

☐ ATTORNEY PICK-UP ☐ CONSTABLE

☒ CIVIL PROCESS SERVER - Authorized Person to Pick-up: Court Records Research Phone: _____

☐ MAIL ☐ CERTIFIED MAIL

☐ PUBLICATION:

Type of Publication: ☐ COURTHOUSE DOOR, or
☐ NEWSPAPER OF YOUR CHOICE: _____

☐ OTHER, explain _____

2. NAME: 110 S. Festival, LLC

ADDRESS: 909 E. Rio Grande Ave., El Paso, Texas, 79902

AGENT, (if applicable): Daniel S. Gonzalez

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): Citation

SERVICE BY (check one):

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PHONE NUMBER: 713 223-5393 FAX NUMBER: 713 223-5909
area code phone number area code fax number

EMAIL ADDRESS: cleavitt@txattorneys.com

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **44 FOUNTAIN RD., LLC**, which may be served with process by serving its registered, **DANIEL S. GONZALEZ at 909 E. RIO GRANDE, EL PASO, TEXAS 79902** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: *JoAnn Acosta* Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	MONTH	DATE DAY	YEAR	Hour	TIME Min.	_____M.	Place, and Course and Distance From Court House

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff

_____ County, Texas
Total _____ \$ _____ by _____ Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **110 S. FESTIVAL, LLC**, who may be served with process by serving its registered agent, **DANIEL S. GONZALEZ** at **909 E. RIO GRANDE, EL PASO, TEXAS 79902** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	MONTH	DATE DAY	YEAR	Hour	TIME Min.	.M.	Place, and Course and Distance From Court House

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff

_____ County, Texas

Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,

_____ on the _____ day of _____,

20____, at _____ o'clock ____m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **BERTHA OLGA GOMEZ FONG**, who may be served with process at **343 CRIMSON CLOUD, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta, Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	MONTH	DATE DAY	YEAR	Hour	TIME Min. _____ M.	Place, and Course and Distance From Court House

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff
_____ County, Texas

Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **CAD CONSTRUCTION, INC.**, which may be served with process by serving its registered agent **CESAR ADRIAN DUARTE** at **343 CRIMSON CLOUD, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta Deputy
JoAnn Acosta

Rule 106: "-the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	MONTH	DATE DAY	YEAR	Hour	TIME Min.	_____M.	Place, and Course and Distance From Court House

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff

_____ County, Texas

Total _____ \$ _____ by _____ Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **CESAR ADRIAN DUARTE GOMEZ**, who may be served with process at **378 MORNING STAR, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at **9:55** before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta, Deputy
JoAnn Acosta

Rule 106: "-the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	DATE			TIME		Place, and Course and Distance From Court House
	MONTH	DAY	YEAR	Hour	Min. _____ M.	

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff

_____ County, Texas
Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **CESAR HORACIO DUARTE JAQUEZ**, who may be served with process at **343 CRIMSON CLOUD, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: *JoAnn Acosta* Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	DATE			TIME		Place, and Course and Distance From Court House
	MONTH	DAY	YEAR	Hour	Min. _____ M.	

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff _____

_____ County, Texas
Total _____ \$ _____ by _____ Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____, County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **GABRIELA ARMENDARIZ CHAPARRO**, who may be served with process at **6928 DIAMOND RIDGE DR, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	DATE			TIME		Place, and Course and Distance From Court House
	MONTH	DAY	YEAR	Hour	Min. _____ M.	

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff

_____ County, Texas

Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **MANUEL ALBERTO GARZA**, who may be served with process at **236 HIDDEN CREST CIRCLE, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at **10:00 FEB 25 PM 2020** before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta Deputy
JoAnn Acosta

Rule 106: "-the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	MONTH	DATE DAY	YEAR	Hour	TIME Min. _____ M.	Place, and Course and Distance From Court House

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff
_____ County, Texas

Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **OLGA DUARTE JAQUEZ**, who may be served with process at **100 STERN DRIVE, EL PASO, TEXAS 79932** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	DATE			TIME		Place, and Course and Distance From Court House
	MONTH	DAY	YEAR	Hour	Min. _____ M.	

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff
_____ County, Texas

Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,
_____ on the _____ day of _____,
20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____, County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **OLGA SOFIA DUARTE GOMEZ**, who may be served with process at **343 CRIMSON CLOUD, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: JoAnn Acosta, Deputy
JoAnn Acosta

Rule 106: "-the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

RETURN

Came on hand on _____ day of _____, 20____, at _____ o'clock _____ M., and executed in _____ County, Texas, by delivering to each of the within-named defendants, in person, a true copy of this Citation, having first endorsed thereon the date of delivery, together with the accompanying true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure**, at the following times and places, to-wit:

NAME	DATE			TIME			Place, and Course and Distance From Court House
	MONTH	DAY	YEAR	Hour	Min.	.M.	

And not executed as to the defendant, _____

The diligence used in finding said defendant, being _____

And the cause of failure to execute this process is: _____

And the information received as to the whereabouts of the said defendant, being _____

FEES—SERVING _____ copy _____ \$ _____ Sheriff

_____ County, Texas

Total _____ \$ _____ by _____, Deputy

CERTIFICATE OF DELIVERY

I do hereby certify that I delivered to _____,

_____ on the _____ day of _____,

20____, at _____ o'clock _____ m. this copy of this instrument.

_____, Sheriff/Agent

_____ County, Texas

By _____, Deputy/Agent

SUBSCRIBED AND SWORN TO BEFORE ME ON THE _____ DAY OF _____, 20____.

(SEAL)

NOTARY PUBLIC, STATE OF TEXAS

El Paso County, 448th District Court
03. 454779Filed 3/17/2020 10:30 AM
Norma Favela Barceleanu
District Clerk
El Paso County
2020DCV0628**THE STATE OF TEXAS**

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **OLGA SOFIA DUARTE GOMEZ**, who may be served with process at **343 CRIMSON CLOUD, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, **ANTHONY G. BUZBEE**, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

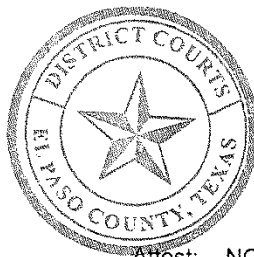
The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: *JoAnn Acosta* Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

CAUSE NO. 2020DCV0628

FREE AND SOVEREIGN STATE OF
CHIHUAHUA

VS.

IN THE 448TH JUDICIAL DISTRICT COURT OF EL PASO COUNTY,
TEXASCESAR HORACIO DUARTE
JAEZ, ET AL

AFFIDAVIT OF SERVICE

BEFORE ME, the undersigned authority, Richard E. Dominguez (SERVER), personally appeared on this day and stated under oath as follows:

1. My name is Richard E. Dominguez (SERVER). I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is:

2200 N. Yarbrough Bldg El Paso, TX 79925
(SERVER'S ADDRESS)

2. ON 3-4-2020 (DATE) AT 2:32 (P.) M (TIME)
CITATION PLAINTIFF FREE AND SOVEREIGN STATE OF CHIHUAHUA'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE came to hand for delivery to OLGA SOFIA DUARTE GOMEZ.

3. ON 3-12-2020 (DATE) AT 8:34 (A.) M (TIME) - The above named documents were delivered to: OLGA SOFIA DUARTE GOMEZ at:

343 CRIMSON CLOUD El Paso, TX 79912
(ADDRESS), by PERSONAL Service

SIGNATURE

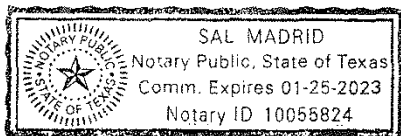
PSC# 2877 EXPIRATION: 8-31-2021

Richard E. Dominguez
AFFIANT PRINTED NAME

SWORN TO AND SUBSCRIBED before me by Richard E. Dominguez appeared on this 13 day of March, 2020 to attest witness my hand and seal of office.

[Signature]
NOTARY PUBLIC IN AND
FOR THE STATE OF TEXAS

2020.03.454776



El Paso County - 448th District Court

Filed 3/19/2020 11:56 AM
 Norma Favela Barceleau
 District Clerk
 El Paso County
 2020DCV0628

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **OLGA DUARTE JAQUEZ**, who may be served with process at **100 STERN DRIVE, EL PASO, TEXAS 79932** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

FREE AND SOVEREIGN STATE OF CHIHUAHUA

VS

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
 District Clerk
 El Paso County Courthouse
 500 E. San Antonio Ave, RM 103
 El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
 El Paso County, Texas

By:  Deputy
 JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

CAUSE NO. 2020DCV0628**FREE AND SOVEREIGN STATE OF
CHIHUAHUA****VS.****IN THE 448TH JUDICIAL DISTRICT COURT OF EL PASO COUNTY,
TEXAS****CESAR HORACIO DUARTE
JAQUEZ, ET AL****AFFIDAVIT OF SERVICE**BEFORE ME, the undersigned authority, Richard E. Dominguez (SERVER), personally appeared on this day and stated under oath as follows:1. My name is Richard E. Dominguez (SERVER). I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is:2200 N. Yarbrough Blvd El Paso, TX 79925
(SERVER'S ADDRESS)2. ON 3-4-2020 (DATE) AT 2:32 (P.) M (TIME)

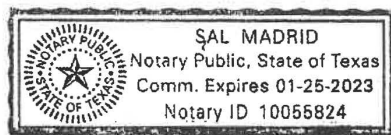
CITATION PLAINTIFF FREE AND SOVEREIGN STATE OF CHIHUAHUA'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE came to hand for delivery to OLGA SOFIA DUARTE GOMEZ.

3. ON 3-12-2020 (DATE) AT 8:34 (A.) M (TIME) - The above named documents were delivered to: OLGA SOFIA DUARTE GOMEZ at:343 CRIMSON CLOUD El Paso, TX 79912
(ADDRESS), by PERSONAL Service

SIGNATURE

PSC# 2871 EXPIRATION: 8-31-2021Richard E. Dominguez
AFFIANT PRINTED NAMESWORN TO AND SUBSCRIBED before me by Richard E. Dominguez appeared on this 13 day of March, 2020 to attest witness my hand and seal of office.[Signature]
**NOTARY PUBLIC IN AND
FOR THE STATE OF TEXAS**

2020.03.454776



03-454761
El Paso County 448th District CourtFiled 3/19/2020 11:54 AM
Norma Favela Barceleau
District Clerk
El Paso County
2020DCV0628**THE STATE OF TEXAS**

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **GABRIELA ARMENDARIZ CHAPARRO**, who may be served with process at **6928 DIAMOND RIDGE DR, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, ANTHONY G. BUZBEE, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

**FREE AND SOVEREIGN STATE OF CHIHUAHUA
VS**

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
El Paso County, Texas

By: *JoAnn Acosta* Deputy
JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

CAUSE NO. 2020DCV0628

**FREE AND SOVEREIGN STATE OF
CHIHUAHUA**

VS.

**IN THE 448TH JUDICIAL DISTRICT COURT OF EL PASO COUNTY,
TEXAS**

**CESAR HORACIO DUARTE
JAQUEZ, ET AL**

AFFIDAVIT OF SERVICE

BEFORE ME, the undersigned authority, Richard E. Dominguez (SERVER), personally appeared on this day and stated under oath as follows:

1. My name is Richard E. Dominguez (SERVER). I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is:

2200 N. Vanbrough B 184 El Paso TX 79925
(SERVER'S ADDRESS)

2. ON 3-4-2020 (DATE) AT 9 : 34 (P) M (TIME)

CITATION PLAINTIFF FREE AND SOVEREIGN STATE OF CHIHUAHUA'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE came to hand for delivery to GABRIELA ARMENDARIZ CHAPARRO.

3. ON 3-5-2020 (DATE) AT 6 : 05 (P) M (TIME) - The above named documents were delivered to: GABRIELA ARMENDARIZ CHAPARRO at:

6928 Diamond Ridge Dr - El Paso, Tx 79912
(ADDRESS), by PERSONAL Service


SIGNATURE

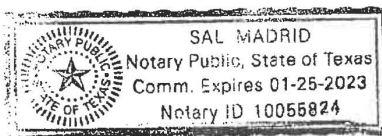
PSC# 2871 EXPIRATION: 8-31-2021

Richard E. Dominguez
AFFIANT PRINTED NAME

SWORN TO AND SUBSCRIBED before me by Richard E. Dominguez appeared on this 5 day of March, 2020 to attest witness my hand and seal of office.


NOTARY PUBLIC IN AND
FOR THE STATE OF TEXAS

2020.03.454761



El Paso County - 448th District Court

Filed 3/24/2020 10:20 AM
 Norma Favela Barceleau
 District Clerk
 El Paso County
 2020DCV0628

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **BERTHA OLGA GOMEZ FONG**, who may be served with process at **343 CRIMSON CLOUD, EL PASO, TEXAS 79912** or wherever he/she may be found

Greetings:

You are hereby commanded to appear by filing a written answer to the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **448th Judicial District Court**, El Paso County, Texas, at the Court House of said County in El Paso, Texas.

Said Plaintiff's Petition was filed in said court on this the 19th day of February, 2020 by Attorney at Law, **ANTHONY G. BUZBEE**, 600 TRAVIS, SUITE 7300, HOUSTON, TX 77002, in this case numbered **2020DCV0628** on the docket of said court, and styled:

FREE AND SOVEREIGN STATE OF CHIHUAHUA VS

CESAR HORACIO DUARTE JAQUEZ, BERTHA OLGA GOMEZ FONG, OLGA SOFIA DUARTE GOMEZ, OLGA DUARTE JAQUEZ, CESAR ADRIAN DUARTE, CAD CONSTRUCTION, INC., GABRIELA ARMENDARIZ CHAPARRO, MANUEL ALBERTO GARZA, 44 FOUNTAIN RD., LLC, and 110 S. FESTIVAL, LLC

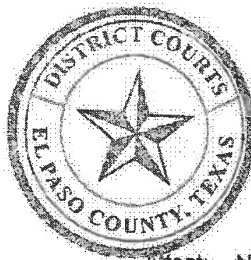
The nature of Plaintiff's demand is fully shown by a true and correct copy of the **Plaintiff's Free and Sovereign State of Chihuahua's Original Petition, Jury Demand, and Request for Disclosure** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 25th day of February, 2020.

CLERK OF THE COURT

NORMA FAVELA BARCELEAU
 District Clerk
 El Paso County Courthouse
 500 E. San Antonio Ave, RM 103
 El Paso, Texas 79901



Attest: NORMA FAVELA BARCELEAU District Clerk
 El Paso County, Texas

By: *JoAnn Acosta* Deputy
 JoAnn Acosta

Rule 106: "the citation shall be served by the officer delivering to each defendant, in person, a true copy of the citation with the date of delivery endorsed thereon and with a copy of the petition attached thereto."

NO. 2020DCV0628

FREE AND SOVEREIGN STATE OF CHIHUAHUA

VS.

CESAR HORACIO DUARTE JAQUEZ, ET AL

§
§
§
§
§
§IN THE 448TH JUDICIAL DISTRICT COURT OF
EL PASO COUNTY, TEXAS

AFFIDAVIT OF SERVICE

BEFORE ME, the undersigned authority, Jesus Guerra (Process Server), personally appeared on this 20 day of March, 2020 and stated under oath as follows:

1. My name is Jesus Guerra (server). I am over the age of eighteen (18), I am not a party to this case, and have no interest in its outcome. I am in all ways competent to make this affidavit and this affidavit is based on personal knowledge. The facts stated herein are true and correct. My business address is:

19 W. Flagler St. Miami, FL 33130
(SERVER'S ADDRESS)

2. ON 3/17/20 (DATE) AT 10:00 (A) M (TIME) CITATION, PLAINTIFF FREE AND SOVEREIGN STATE OF CHIHUAHUA'S ORIGINAL PETITION, JURY DEMAND, AND REQUEST FOR DISCLOSURE came to hand for delivery to BERTHA OLGA GOMEZ FONG.

3. ON 3/20/20 (DATE) AT 8:30 (A) M (TIME) The above named documents were hand delivered to: BERTHA OLGA GOMEZ FONG AT:

92 S.W. 3rd St. #2911 Miami, FL 33130
(ADDRESS), in Person, in accordance to Rule 108 TRCP.

FURTHER AFFIANT SAYETH NOT.

SERVER'S SIGNATURE

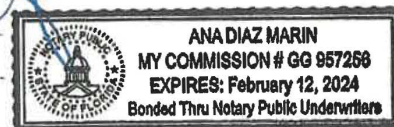
Jesus Guerra #935

SERVER'S PRINTED NAME

SWORN TO AND SUBSCRIBED before me by Jesus Guerra (server) appeared on this 20 day of March, 2020 to attest witness my hand and seal of office.

NOTARY PUBLIC IN AND
FOR THE STATE OF Florida

2020.03.458247



El Paso County - 448th District Court

Filed 3/30/2020 8:36 AM
 Norma Favela Barceleau
 District Clerk
 El Paso County
 2020DCV0628

No. 2020DCV0628

FREE AND SOVEREIGN STATE OF	§	IN THE DISTRICT COURT OF
CHIHUAHUA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
CESAR HORACIO DUARTE JAQUEZ,	§	
BERTHA OLGA GOMEZ FONG,	§	EL PASO COUNTY, TEXAS
OLGA SOFIA DUARTE GOMEZ,	§	
OLGA DUARTE JAQUEZ,	§	
CESAR ADRIAN DUARTE,	§	
CAD CONSTRUCTION, INC.,	§	
GABRIELA ARMENDARIZ CHAPARRO,	§	
MANUEL ALBERTO GARZA,	§	
44 FOUNTAIN RD., LLC, and	§	
110 S. FESTIVAL, LLC,	§	
	§	
Defendants.	§	448TH JUDICIAL DISTRICT

DEFENDANTS' SPECIAL APPEARANCE TO OBJECT TO JURISDICTION

Pursuant to Tex. R. Civ. P. 120a, defendants Cesar Horacio Duarte-Jaquez (“Mr. Duarte”) and Bertha Olga Gomez-Fong (“Ms. Gomez”) (collectively, “Defendants”), through their counsel, specially appear to object to personal jurisdiction and move for dismissal for lack of personal jurisdiction. Defendants lack sufficient minimum contacts with Texas to establish personal jurisdiction, and the exercise of jurisdiction over them would offend traditional notions of fair play and substantial justice.

Texas Rule of Civil Procedure 120a allows defendants to appear specially, without making a general appearance, to object to this Court’s exercise of jurisdiction over them. Defendants give notice that all of their filings, including answers, either alone or jointly with other defendants, and other participation in this suit or any related matter is subject to, and does not waive, this special appearance.

Defendants respectfully request that the Court sustain their Special Appearance to Object to Jurisdiction and dismiss the Original Petition (“Petition”) filed by the Free and Sovereign State of Chihuahua (“Chihuahua” or “Plaintiff”). Defendants preserve and do not waive their right to amend this special appearance and to move to dismiss the Petition, including for lack of personal jurisdiction, in federal court.

FACTUAL AND PROCEDURAL BACKGROUND

On February 19, 2020, Chihuahua filed the Petition giving rise to this action. Ct. Dkt. 1. Without providing any factual detail whatsoever, let alone any substantiating information, the Petition alleges that Mr. Duarte violated Mexican government procurement laws while he was the governor of Chihuahua from 2010 to 2016 by awarding contracts to contractors that would supposedly divert the government’s payments to Mr. Duarte. Pet. at 1-2. According to the Petition, all this happened in Chihuahua. *Id.* at 1-6.

In addition to naming Mr. Duarte (a non-resident of Texas) as a defendant, Chihuahua named several other entities and individuals as defendants—mainly, members of Mr. Duarte’s family and one of their companies: Ms. Gomez (a non-resident of Texas), who is his spouse; Olga Sofia Duarte-Gomez, who is one of his two daughters; Cesar Adrian Duarte-Gomez, who is his son; Olga Duarte-Jaquez, who is his sister; CAD Construction, Inc., which is a company that belongs to Olga and Cesar Adrian Duarte, his daughter and son; and Gabriela Armendariz-Chaparro, who is his sister-in-law. *Id.* at 2-4. The Petition alleges that some of Mr. Duarte’s relatives (but not Mr. Duarte) purchased properties in Texas with the funds that Mr. Duarte purportedly stole from Chihuahua. *Id.* The Petition fails to provide a single fact indicating where and how Mr. Duarte’s family received any funds from Mr. Duarte, however, or why the funds

that Mr. Duarte's family used to purchase properties in Texas have any connection of any kind with Mr. Duarte's supposed misconduct.

The Petition purports to plead six state law causes of action arising out of Mr. Duarte's tenure as governor of Chihuahua: conversion, Theft Liability Act, constructive trust, civil conspiracy, joint and several liability, and Texas Penal Code 31.03(e)(7) (theft). *Id.* at 5-7.

I. Chihuahua Failed to Plead Any Jurisdictional Allegations.

"A court may assert personal jurisdiction over a nonresident defendant only if the requirements of both the Due Process Clause of the Fourteenth Amendment to the U.S. Constitution and the Texas long-arm statute are satisfied." *CSR Ltd. v. Link*, 925 S.W.2d 591, 594 (Tex. 1996). "The plaintiff has the initial burden of pleading sufficient allegations to bring the nonresident defendant within the provisions of the Texas long-arm statute." *Zamarron v. Shinko Wire Co., Ltd.*, 125 S.W.3d 132, 137 (Tex. App. 2003). "If the plaintiff does not plead jurisdictional allegations, *i.e.*, that the defendant has committed any act in Texas," the defendant can negate all bases of personal jurisdiction by presenting evidence that it is a nonresident. *Id.*

In its Petition, Chihuahua fails to plead any allegations that Mr. Duarte or Ms. Gomez reside in Texas (general jurisdiction); conduct continued and systematic business in Texas (general jurisdiction); or committed any tort in Texas (specific jurisdiction). As such, Chihuahua failed to plead any grounds for Texas courts to exercise personal jurisdiction over Defendants.

II. Chihuahua Failed to Plead Minimum Contacts with Texas.

A Texas court does not have jurisdiction over a nonresident defendant unless the plaintiff demonstrates that the nonresident defendant has purposefully established "minimum contacts" with Texas and the court's exercise of jurisdiction over defendant comports with "fair play and substantial justice." *Moki Mac River Expeditions v. Drugg*, 221 S.W.3d 569, 575 (Tex. 2007);

BMC Software Belgium, N. v. Marchand, 83 S.W.3d 789, 795 (Tex. 2002); *Guardian Royal Exch. Assurance, Ltd. v. English China Clays, P.L.C.*, 815 S.W.2d 223, 226 (Tex. 1991). To establish minimum contacts, a plaintiff must demonstrate that the nonresident defendant availed itself purposefully of the privilege of conducting activities within Texas, and that the causes of action arise from the nonresident defendant's contacts with Texas. *See Moki Mac*, 221 S.W.3d at 575-76; *Commonwealth Gen. Corp. v. York*, 177 S.W.3d 923, 925 (Tex. 2005); *BMC Software*, 83 S.W.3d at 795-96.

The Petition is devoid of allegations that Mr. Duarte or Ms. Gomez purposefully availed themselves of the privilege of conducting activities in Texas or that the causes of action against them arise from any supposed connections between them and Texas. Therefore, the Court has no personal jurisdiction over Mr. Duarte or Ms. Gomez.

CONCLUSION AND PRAYER

For these reasons, there are no grounds for a Texas court to exercise personal jurisdiction over defendants. Defendants have no minimum contacts with this State to justify a Texas court's assumption of personal jurisdiction over them. This action continuing against them would offend traditional notions of fair play and substantial justice. Defendants respectfully ask the Court to sustain their special appearance and enter a final judgment dismissing the Petition.

Dated: March 30, 2020

Respectfully submitted,

/s/ R. Paul Yetter

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading was served via the Court's e-filing service and/or by email on all counsel of record, on the 30th day of March 2020.

/s/ Bryce L. Callahan

Bryce L. Callahan

El Paso County - 448th District Court

Filed 3/30/2020 8:41 AM
 Norma Favela Barceleau
 District Clerk
 El Paso County
 2020DCV0628

No. 2020DCV0628

FREE AND SOVEREIGN STATE OF	§	IN THE DISTRICT COURT OF
CHIHUAHUA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
CESAR HORACIO DUARTE JAQUEZ,	§	
BERTHA OLGA GOMEZ FONG,	§	EL PASO COUNTY, TEXAS
OLGA SOFIA DUARTE GOMEZ,	§	
OLGA DUARTE JAQUEZ,	§	
CESAR ADRIAN DUARTE,	§	
CAD CONSTRUCTION, INC.,	§	
GABRIELA ARMENDARIZ CHAPARRO,	§	
MANUEL ALBERTO GARZA,	§	
44 FOUNTAIN RD., LLC, and	§	
110 S. FESTIVAL, LLC,	§	
	§	
Defendants.	§	448TH JUDICIAL DISTRICT

ORIGINAL ANSWER SUBJECT TO SPECIAL APPEARANCE

Subject to the previously filed Special Appearance, defendants Cesar Horacio Duarte-Jaquez, Bertha Olga Gomez-Fong, Olga Sofia Duarte-Gomez, Olga Duarte-Jaquez, Cesar Adrian Duarte-Gomez, CAD Construction, Inc., and Gabriela Armendariz-Chaparro (collectively, “Defendants”), through their counsel, file this Original Answer Subject to Special Appearance (“Answer”) to the Original Petition (“Petition”) of the Free and Sovereign State of Chihuahua (“Chihuahua” or “Plaintiff”).

GENERAL DENIAL

Pursuant to Tex. R. Civ. P. 92, Defendants deny each and every, all and singular, of the allegations in the Petition and respectfully request that the Court require Chihuahua to prove its charges and allegations by a preponderance of the evidence, as required by the Constitution and laws of the State of Texas. Defendants respectfully reserve their right to amend this Answer after

they have the opportunity to more closely investigate these claims, as is their right and privilege under the Texas Rules of Civil Procedure and the laws of the State of Texas.

PRAYER

Therefore, Defendants respectfully pray that the Court render judgment that Plaintiff takes nothing in this suit, that Defendants be awarded their costs, and for all other and further relief, general or special, at law or in equity, to which they are entitled.

Dated: March 30, 2020

Respectfully submitted,

/s/ R. Paul Yetter

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I certify that a true and correct copy of this pleading was served via the Court's e-filing service and/or by email on all counsel of record, on the 30th day of March 2020.

/s/ Bryce L. Callahan

Bryce L. Callahan